

MEGHANN A. TRIPLETT (SBN 268005)  
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Attorneys for Jeremy W. Faith, Chapter 11 Plan Fiduciary

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SAN FERNANDO VALLEY DIVISION**

In re:

NATIONAL ASSOCIATION OF  
TELEVISION PROGRAM EXECUTIVES,  
INC.,

Debtor.

JEREMY W. FAITH, Chapter 11 Plan  
Fiduciary,

Plaintiff,

v.

PERY CONSULTING GROUP, LLC, a  
California Limited Liability Company

Defendant.

Case No.: 1:22-bk-11181-MB

Chapter 7

Adv. No.: 1:24-ap-01052-MB

**PLAINTIFF'S UNILATERAL STATUS  
REPORT**

**Status Conference:**

Date: April 16, 2025

Time: 1:30 p.m.

Place: U.S. Bankruptcy Court  
Courtroom 303  
21041 Burbank Boulevard  
Woodland Hills, CA 91367

**A. PLEADINGS/SERVICE**

1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims documents)? **Yes, as to the original complaint filed. However, Plaintiff intends to seek leave to amend the complaint to add defendant, Accounting 501, LLC a Wyoming Limited Liability Company, registered in California as a foreign entity under the California Alternative Name A501, LLC (referred to herein as "Accounting 501"), and that is the immediate or mediate transferee of property transferred by the debtor that is the subject of the complaint and recoverable under**

1 **section 550 of the Bankruptcy Code. Moreover, Plaintiff intends to allege the**  
2 **factual predicates establishing that Accounting 501 is an alter ego of defendant**  
3 **Pery Consulting Group, LLC (“Pery Consulting”).**

4 2. Have all parties filed and served answers to the Claims Documents? **No**

5 3. Have all motions addressed to the Claims Documents been resolved? **No**

6 4. Have counsel met and conferred in compliance with LBR 7026-1? **No.**

7 5. If your answer to any of the four preceding questions is anything other than  
8 an unqualified “YES”, please explain: **Defendant Pery Consulting has not responded**  
9 **to the Complaint. Default was entered on December 31, 2024. Plaintiff intends to**  
10 **seek leave to amend the complaint because, since filing the complaint, Plaintiff has**  
11 **learned of facts demonstrating that the Defendant fraudulently transferred all or**  
12 **substantially all of its assets to Accounting 501 the alter ego of Pery Consulting.**

13 **B. READINESS FOR TRIAL**

14 1. When will you be ready for trial in this case? **N/A**

15 2. If your answer to the above is more than 4 months after the summons  
16 issued in this case, give reasons for further delay. **N/A**

17 3. When do you expect to complete your discovery efforts? **N/A**

18 4. What additional discovery do you require to prepare for trial? **N/A**

19 **C. TRIAL TIME**

20 1. What is your estimate of the time required to present your side of the case at  
21 trial (including rebuttal stage of applicable)? **N/A**

22 2. How many witnesses do you intend to call at trial (including opposing  
23 parties)? **N/A**

24 3. How many exhibits do you anticipate using at trial? **N/A**

25 **D. PRETRIAL CONFERENCE**

26 1. A pretrial conference is not requested for the following reason: **Plaintiff**  
27 **intends to add defendants and additional allegations to the complaint.**

28 **///**

1 **E. SETTLEMENT**

- 2 1. What is the status of settlement efforts? **N/A**  
3 2. Has this dispute been formally mediated? **No**  
4 3. Do you want this matter sent to mediation at this time? **No**

5 **F. FINAL JUDGMENT/ORDER:**

6 Any party who contests the bankruptcy court's authority to enter a final judgment  
7 and/or order in this adversary proceeding must raise its objection below. Failure to select  
8 either box below may be deemed consent. **Plaintiff consents. Defendant Pery**  
9 **Consulting failed to file a responsive pleading to the complaint and default was**  
10 **entered against the Defendant.**

11 **G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL:**

12 **Following the Default, on January 13, 2025, Plaintiff received a letter from**  
13 **Rafe Pery, the C.E.O. of Pery Consulting, regarding the complaint. In the letter, Mr.**  
14 **Pery notified the Plaintiff, that Pery Consulting "completed a sale of its assets**  
15 **through an Article 9 transaction and is in liquidation." Mr. Pery concluded his letter**  
16 **by stating that "any attempt to collect on prior payments made or collect on a**  
17 **judgement will be fruitless as Pery Consulting Group LLC does not have any**  
18 **assets." Thereafter, Plaintiff learned of facts demonstrating that Pery Consulting**  
19 **fraudulently transferred its assets to its alter ego Accounting 501.**

20 **As described above, Plaintiff intends to file a motion seeking leave to amend**  
21 **the complaint and requests that the Court continue the status conference hearing in**  
22 **this matter for approximately 90 days to allow for Plaintiff's motion to be**  
23 **considered by the Court and for Plaintiff to file an amended complaint.**

24 DATED: April 8, 2025

**MARGULIES FAITH, LLP**

26 By: /s/ Meghann A. Triplett  
27 Meghann A. Triplett  
Jonathan Serrano  
28 Attorneys for Plaintiff, Jeremy W. Faith,  
Chapter 11 Plan Fiduciary

**DECLARATION OF MEGHANN A. TRIPLETT**

I, Meghann A. Triplett, declare as follows:

1. I am an attorney licensed to practice before all courts of the State of California and before the United States District Court for the Central District of California. I am an attorney at the law firm of Margulies Faith, LLP, and am one of the attorneys responsible for the representation of Jeremy W. Faith, Chapter 11 Plan Fiduciary and Plaintiff herein ("Plaintiff").

2. I make this Declaration in support of the Plaintiff's unilateral status report, to which this declaration is attached.

3. On October 11, 2024, Plaintiff filed the *Complaint for: (1) Avoidance of Pre-Petition Transfers [11 U.S.C. § 547]; (2) Avoidance of Unauthorized Post Petition Transfers [11 U.S.C. § 549]; (3) Recovery of Avoided Transfer [11 U.S.C. § 550]; and (4) Disallowance of Proof of Claim [11 U.S.C. § 502(d)]* (the "Complaint") against defendant Pery Consulting Group, LLC, a California Limited Liability Company ("Defendant").

4. Pursuant to the terms of the Summons a deadline for filing an answer or other response to the Complaint was December 2, 2024 (the "Response Deadline"). The Defendant failed to file an answer to the Complaint. Consequently, Plaintiff filed a Request for Entry of Default Under Local Bankruptcy Rule 7055-1(a) as to Defendant. On December 31, 2024, the Clerk entered default against the Defendant (Adv. Dkt. No. 10).

5. On or about January 13, 2025, I received a letter via email from Pery Consulting signed by Rafe Pery, the C.E.O. of Pery Consulting, responding to the complaint. In the letter, Pery notified the Plaintiff that Pery Consulting "completed a sale of its assets through an Article 9 transaction and is in liquidation." Mr. Pery concluded his letter by stating that "any attempt to collect on prior payments made or collect on a judgement will be fruitless as Pery Consulting Group LLC does not have any assets."

6. Plaintiff conducted further investigation and has learned facts demonstrating that Pery Consulting fraudulently transferred all or substantially all of its assets to its alter ego, Accounting 501.

7. Based on the foregoing, I am filing a unilateral status report, and Plaintiff intends to file a motion seeking leave to amend the complaint to add Accounting 501 as a defendant, and requests that the Court continue the status conference hearing in this matter for approximately 90 days to allow for Plaintiff's motion to be considered by the Court and for Plaintiff to file an amended complaint.

/s/ Meghann A. Triplett  
Meghann A. Triplett

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
16030 Ventura Blvd., Suite 470, Encino, CA 91436

A true and correct copy of the documents entitled **PLAINTIFF'S UNILATERAL STATUS REPORT; DECLARATION OF MEGHANN A. TRIPLETT IN SUPPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **April 8, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On **April 8, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**JUDGE'S COPY:** Service on Judge not required per Judge Barash's Procedures re: Serving Judge's Copy of Documents (Rev. 1/8/24)

**DEFENDANT:** Pery Consulting Group, LLC, Agent: Rafe Pery, 7607 Wiscasset Drive, West Hills, CA 91304

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

NONE.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 8, 2025  
Date

Vicky Castrellon  
Printed Name

/s/ Vicky Castrellon  
Signature

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**ADDITIONAL SERVICE INFORMATION**

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

**Samuel Mushegh Boyamian on behalf of Plaintiff Jeremy W. Faith, Chapter 11 Plan Fiduciary**

samuel@marguliesfaithlaw.com,  
Angela@MarguliesFaithLaw.com;Vicky@MarguliesFaithLaw.com;Amber@MarguliesFaithLaw.com

**John-Patrick McGinnis Fritz (TR)**

jpfrustee@lnbyg.com, jpf@trustesolutions.net

**Jonathan Serrano on behalf of Interested Party Courtesy NEF**

Jonathan@MarguliesFaithLaw.com,  
vicky@marguliesfaithlaw.com;angela@marguliesfaithlaw.com;amber@marguliesfaithlaw.com

**Meghann A Triplett on behalf of Plaintiff Jeremy W. Faith, Chapter 11 Plan Fiduciary**

Meghann@MarguliesFaithlaw.com,  
Angela@MarguliesFaithLaw.com;Vicky@MarguliesFaithLaw.com;Amber@MarguliesFaithLaw.com

**United States Trustee (SV)**

ustpregion16.wh.ecf@usdoj.gov